REMARKS/ARGUMENTS

Applicant thanks the Examiner for his careful review of this application. Claims 12-22 have been rejected. Applicant respectfully requests reconsideration of the application in view of the following remarks submitted in support thereof.

Rejections under 35 U.S.C. §112, First Paragraph

The Examiner rejected claims 12-22 under 35 U.S.C. §112, first paragraph as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to make and to use the invention. The Applicant respectfully traverses and believes that the subject matter is described in the specification in such a way as to enable one skilled in the art to make and to use the invention. In particular, the Examiner noted that the specification does not disclose a connector provider or a deployer as defined in independent claim 18. The Applicant directs the Examiner to page 4, lines 10-12 of the specification that specifically discloses the terms "connector provider" and "deployer." At the request of the Examiner, the Applicant directs the Examiner to a mapping of the claims to the specification below to address the Examiner's other 35 U.S.C. §112, first paragraph rejections:

Claim 12: A method to provide a resource adapter that collaborates with an application server to provide services offered by an enterprise information system (EIS), comprising:

packaging (page 4, lines 8-10) a deployment descriptor (page 4, lines 10-12; page 6, lines 1-5; page 10, lines 14-16; and page 19, line 16 - page 30, line 8) into the resource adapter (page 4, lines 4-5, 10, 13-14); and

deploying (page 4, lines 16-18; page 13, line 18 - page 18, line 16) the resource

adapter into a target operational environment based on properties defined in the deployment

descriptor (page 6, lines 1-5).

Claim 13: The method of claim 12, wherein deploying the resource adapter into a

target operational environment based on properties defined in the deployment descriptor

includes,

configuring the resource adapter in the target operational environment to create a

connection to an instance of the EIS (page 5, lines 2-3; page 7, lines 8-16; page 10, lines 3-

16; and pages 13-14).

Claim 14: The method of claim 12, wherein deploying the resource adapter into a

target operational environment based on properties defined in the deployment descriptor

includes,

configuring application server mechanisms for transaction management (page 8, line

23 – page 9, line 1).

Claim 15: The method of claim 12, wherein deploying the resource adapter into a

target operational environment based on properties defined in the deployment descriptor

includes,

configuring security in the target operational environment (page 27, line 14 - page 30,

line 8).

Claim 16: The method of claim 12, wherein packaging includes,

packaging interfaces, implementation classes, utility classes, native libraries, and

descriptive meta information into the resource adapter (page 2, lines 15-22 and page 4).

Claim 17: The method of claim 12, wherein the target operational environment is

selected from the group consisting of an application server and a Java 2 Platform, Enterprise

Edition (J2EE) application (page 4, lines 16-18).

Claim 18: A system to provide a resource adapter that collaborates with an

application server to provide services offered by an enterprise information system (EIS),

comprising:

a connector provider (page 4, lines 4-5 and 10-12; pages 6-8) to create the resource

adapter, the connector provider specifying a deployment descriptor (page 4, lines 10-12; page

6, lines 1-5; page 10, lines 14-16; and page 19, line 16 - page 30, line 8) in the resource

adapter (page 4, lines 4-5, 10, 13-14); and

a deployer (page 4, lines 10-12) to deploy (page 4, lines 16-18; page 13, line 18 - page

18, line 16) the resource adapter into a target operational environment based on properties

defined in the deployment descriptor (page 6, lines 1-5).

Claim 19: The system of claim 18, wherein the deployment descriptor includes a

connector (page 4, lines 10-12; pages 6-8), the connector enabling connections to the EIS.

Claim 20: The system of claim 18, wherein the deployment descriptor includes

connector contracts between the connector provider and the deployer.

Claim 21: The system of claim 18, wherein the deployment descriptor includes declarative information enabling the deployer to deploy the resource adapter into the target operational environment (page 6, lines 1-5).

Claim 22: The system of claim 18, wherein the resource adapter includes interfaces, implementation classes, utility classes, native libraries, and descriptive meta information (page 5, lines 5-18).

As a result, the Applicant submits that claims 12-22 are patentable under 35 U.S.C. §112, first paragraph because the above-referenced terms defined in claims 12-22 have clear support in the description, with exemplary source code, such that one skilled in the art can easily make and use the claimed invention without undue experimentation. The Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. §112, first paragraph rejection.

Rejections under 35 U.S.C. §112, second paragraph

The Examiner also rejected claims 12-22 under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter. Specifically, the Examiner noted that the scope of the claims are not clear. The Applicant directs the Examiner to a mapping of the claims as discussed above to provide the proper scope of the claims. Accordingly, in view of the mapping, the Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. §112, second paragraph rejection.

Anticipation Rejections under 35 U.S.C. §102(a)

The Examiner has rejected independent claims 12 and 18 under 35 U.S.C. §102(a) as being anticipated by U.S. Patent No. 6,687,745 to Franco et al. For the reasons put forth

below, Applicant respectfully asserts that Franco et al. fail to identically disclose each and every feature specified in independent claims 12 and 18.

Independent claims 12 and 18 define a method and a system to provide a resource adapter that collaborates with an application server to provide services offered by an enterprise information system. In the method of claim 12, a deployment descriptor is packaged into the resource adapter. Thereafter, the resource adapter is deployed into a target operational environment based on properties defined in the deployment descriptor. Similarly, the system of claim 18 includes a connector provider to create the resource adapter, whereby the connector provider specifies the deployment descriptor in the resource adapter. The system also includes a deployer to deploy the resource adapter into the target operational environment based on properties defined in the deployment descriptor.

In response to the Applicant's Amendment mailed June 14, 2004, the Examiner further clarified his interpretation by providing a detailed mapping of the claims to the specification of Franco et al. The Applicant appreciates the mapping, but Franco et al. still fail to teach each and every element of the claimed invention. In particular, the Examiner noted that Franco et al. teach packaging a deployment descriptor into the resource adapter, as defined in independent claim 12. Again, the Applicant respectfully traverses the Examiner's characterization of Franco et al. relative to independent claim 12 because Franco et al. do not teach packaging a deployment descriptor into the resource adapter and deploying the resource adapter into a target operational environment based on properties defined in the deployment descriptor.

In particular, the Examiner equated the term "packaging" as defined in independent claim 12 with the terms "put together or downloading" (see Final Office Action mailed October 5, 2004 at page 5). The term "put together" is not disclosed anywhere in Franco et

al. With regard to the term "downloading," at column 11, lines 40-49, <u>Franco et al</u>. disclose

"downloading" in terms of:

> In one embodiment, the information 43 is provided by the
> application server 40 to the client computer 20 and stored
> therein in anticipation of a later use ... In this embodiment,
> for example, the remotely stored application 41 and
> information 43 are <u>downloaded</u> and locally installed and/or
> stored at the client computer 20.

Thus, <u>Franco et al</u>. disclose downloading in the context of transferring information from an

application server to a client computer. Such definition simply is inconsistent with <u>packaging</u>

a deployment descriptor into the resource adapter, as defined in independent claim 12. Since

<u>Franco et al</u>. disclose downloading in a completely different context, <u>Franco et al</u>. cannot

reasonably be considered to teach packaging the deployment descriptor into the resource

adapter, as defined in independent claim 12.

The Examiner additionally noted that "Applicants agrees that Franco has a resource

adapter" (see Final Office Action mailed October 5, 2004 at page 4). The Examiner then

assumed that a "resource adapter therefore inherently has a creator (connector provider) for

creating the resource adapter" and therefore, <u>Franco et al</u>. inherently disclose a connector

provider, as defined in independent claim 18 (see Final Office Action mailed October 5, 2004

at page 4). Applicant respectfully traverses the Examiner's characterization of Applicant's

remarks as the Applicant never agreed that <u>Franco et al</u>. disclose a resource adapter. Thus,

the Examiner's assumption cannot stand because such assumption is based on a false

interpretation of the Applicant's remarks, and <u>Franco et al</u>. cannot reasonably be considered

to teach a connector provider that creates the resource adapter and specifies the deployment

descriptor in the resource adapter, as defined in independent claim 18. If the Examiner

disagrees, then the Applicant invites the Examiner to cite to the specific section that the

Applicant supposedly made the admission.

Furthermore, the Examiner noted that Franco et al. teach the deployment of the

resource adapter into a target operational environment based on properties defined in the

deployment descriptor, as defined in independent claims 12 and 18. The Applicant

respectfully traverses the Examiner's characterization of Franco et al. relative to independent

claims 12 and 18 because the portion of the reference relied upon by the Examiner (col. 29,

lines 8-10) Franco et al. do not teach deploying the resource adapter into a target operational

environment based on properties defined in the deployment descriptor. Specifically, the

Examiner noted that the properties defined in the deployment descriptor, as defined in

independent claims 12 and 18, equate to "instructions defined in the application programs" as

disclosed in Franco et al (see Final Office Action mailed October 5, 2004 at page 5). In

support, the Examiner noted that the application drivers disclosed in Franco et al. are the

instructions defined in the application programs. However, Franco et al. disclose that:

> messages transmitted from application drivers, e.g., the
> application specific logic 46 supporting a droplet-enabled
> application, on the application server 40 to the client
> computer 20 (col. 12, lines 14-17).

Accordingly, Franco et al. teach that application drivers located on a remote server merely

support droplet-enabled applications located on a client computer. The application drivers

are actually separate from the droplet-enabled application. In contrast, independent claims 12

and 18 defines the deployment of the resource adapter into a target operational environment

based on properties defined in the deployment descriptor. As Franco et al. teach that

application drivers and application programs are in separate locations, Franco et al. cannot

reasonably be considered to teach deploying the resource adapter into a target operational

environment based on properties defined in the deployment descriptor, as disclosed in

independent claims 12 and 18.

As <u>Franco et al</u>. fail to teach each and every element of the claimed invention, the Applicant respectfully submits that independent claims 12 and 18 are patentable under 35 U.S.C. § 102(a) over <u>Franco et al</u>. Accordingly, the Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 102(a) rejections for independent claims 12 and 18.

Obviousness Rejections under 35 U.S.C. §103(a)

Dependent claims 13-17 and 19-22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over <u>Franco et al</u>. in view of what is well known in the art. For example, in support of the 35 U.S.C. §103(a) rejection, the Examiner noted that "configuring an electronic equipment is well known in the art" and "[c]laims 20 and 22 merely recites intended use of a memory" (see Final Office Action mailed October 5, 2004 at page 6). As with the anticipation rejections, the Examiner's interpretation of the claims is simply too broad in view of the specification. For instance, the Examiner only noted that dependent claim 20 "merely recites intended use of a memory" (see Final Office Action mailed October 5, 2004 at page 6). However, dependent claim 20 defines a deployment descriptor that includes connector contracts between the connector provider and the deployer. The use of memories and deployment descriptor relates to entirely different technologies and applications. As such, the Applicant respectfully traverses the Examiner's reliance on common knowledge, and asks the Examiner to specify each portion of <u>Franco et al</u>. that particularly teach or suggest each *element* of the claimed invention or provide other documentary evidence (see M.P.E.P §2144.03). Further, claims 13-17 and 19-22, each of which depends directly or indirectly from independent claims 12 and 18, are patentable under 35 U.S.C. §103(a) over <u>Franco et al</u>. for at least the same reasons set forth for independent claims 12 and 18. As a result, the Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. §103(a) rejections.

Conclusion

In view of the foregoing, the Applicant respectfully submits that all the pending

claims 12-22 are in condition for allowance. Accordingly, a Notice of Allowance is

respectfully requested. If the Examiner has any questions concerning the present request, the

Examiner is requested to contact the undersigned at (408) 774-6924. If any additional fees

are due in connection with filing this request, the Commissioner is also authorized to charge

Deposit Account No. 50-0805 (Order No. SUNMP148). A duplicate copy of the transmittal

is enclosed for this purpose.

Respectfully submitted,
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